

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

RONALD TALLQUIST ,

Plaintiff,

-VS-

Case No.  
Hon.

LTD FINANCIAL SERVICES, L.P.,

Defendant.

**COMPLAINT & JURY DEMAND**

**Jurisdiction**

1. This court has federal question jurisdiction under the Fair Debt Collection Practices Act, 15 U.S.C. §1692k(d) and 28 U.S.C. §§1331, 1337.
2. This court may exercise supplemental jurisdiction over the related state law claims arising out of the same nucleus of operative facts which give rise to the Federal law claims.

**Parties**

3. The Plaintiff to this lawsuit resides in Clinton Twp, Michigan in Macomb County.
4. LTD Financial Services, Limited Partnership, is a corporation doing business in Michigan.

**Venue**

5. The transactions and occurrences which give rise to this action occurred in Macomb County.
6. Venue is proper in the Eastern District of Michigan.

**General Allegations**

7. Between May 1, 2008 and the present, the Defendant called the Plaintiff in excess of 15 times, left messages on Plaintiff's answering machine and failed to disclose that the message was from a debt collector.
8. On September 6, 2008, Plaintiff spoke with "Paul" an agent of the Defendant debt collector.
9. Paul attempted to mislead the Plaintiff by stating that the "law" dictated that if Plaintiff made \$75.00 per month payments for a year, that no creditor could take him to court.

**COUNT I – Fair Debt Collection Practices Act**

**(LTD Financial Services, Limited Partnership)**

10. Mr. Tallquist incorporates the preceding allegations by reference.
11. At all relevant times LTD Financial Services, Limited Partnership – in the ordinary course of its business – regularly engaged in the practice of collecting debts on behalf of other individuals or entities.
12. LTD Financial Services, Limited Partnership is a "debt collector" under the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §1692a(6).
13. LTD Financial Services, Limited Partnership's foregoing acts in attempting to collect this alleged debt against Mr. Tallquist constitute violations of the FDCPA.
14. Mr. Tallquist has suffered damages as a result of these violations of the FDCPA.

**COUNT II – Michigan Occupational Code (LTD Financial Services, Limited Partnership)**

15. Mr. Tallquist incorporates the preceding allegations by reference.
16. LTD Financial Services, Limited Partnership is a "collection agency" as that term is defined in the Michigan Occupational Code ("MOC"), M.C.L. § 339.901(b).

17. Mr. Tallquist is a debtor as that term is defined in M.C.L. § 339.901(f).
18. LTD Financial Services, Limited Partnership 's foregoing acts in attempting to collect this alleged debt against Mr. Tallquist constitute violations of the Occupational Code.
19. Mr. Tallquist has suffered damages as a result of these violations of the Michigan Occupational Code.

**Demand for Jury Trial**

20. Plaintiff demands trial by jury in this action.

**Demand For Judgment for Relief**

*ACCORDINGLY, Mr. Tallquist requests that the Court:*

- a. Assume jurisdiction over all claims;.*
- b. Award actual damages.*
- c. Award statutory damages.*
- d. Award punitive damages.*
- e. Award statutory costs and attorney fees.*

Respectfully Submitted,

ADAM G. TAUB & ASSOCIATES  
CONSUMER LAW GROUP, PLC

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